

**Q.** A competitor's pricing information was posted on an Internet blog. The information is marked "confidential." Can I use this information in preparing a customer bid?

**A.** If you have reason to believe that the blogger was not authorized to post the information and that it is non-public, you should contact your supervisor and Legal to receive guidance before using the information.

Do not acquire or disclose non-public information.

Corporate credit cards are to be used only for approved business purposes.

**Q.** I am responding to a large business customer's Request for Proposal (RFP). The customer sent me an email that attached our competitor's quote for the RFP response; the customer asked me if Verizon can beat the competitor's pricing. What should I do?

**A.** Contact Legal, preserve the email, and do not take further action until directed by Legal. Do not share or use non-public competitor confidential information.

### 3.2.2 Acquiring Non-public Company Information of Others

You cannot accept non-public information belonging to a third party (including information from a former employer) unless the person disclosing the information is authorized to do so, Verizon has the owner's written permission to receive it and the information is provided according to a written agreement that has been approved in advance by your supervisor and the Legal Department.

### 3.3 Proper Use of Verizon's Property and Property Owned by Others

You must always protect Verizon's tangible and intangible property and any property entrusted to your care by customers or business providers. Company property and the property of co-workers, customers and business providers may not be taken, sold, loaned, given away or otherwise disposed of, regardless of its condition or value, without specific authorization. Property includes, but is not limited to, tangible property, data, records and all communications.

Unless permitted by written company policy, it is never appropriate to use Verizon machinery, switching equipment or vehicles for personal purposes, or any device or system to obtain unauthorized free or discounted service.

#### 3.3.1 Company Benefits

Verizon's benefits plans and programs are provided as compensation and must be used honestly. You must not misrepresent your health status, your covered members, your beneficiaries, or any other facts, including reasons for absence, in order to claim benefits to which you or others are not entitled.

#### 3.3.2 Company Property and Funds

Company property and funds—which include anything that has or represents financial value—must be handled responsibly, honestly and in accordance with applicable company policies. Personal or unauthorized use of company funds is strictly prohibited. Corporate credit cards must be used solely for authorized business purposes and may not be used for personal charges.

#### 3.3.3 Work Time

You must keep accurate records regarding your work time. You may not instruct another employee to misreport or fail to report any time worked. Overtime eligible employees must report all time worked. By submitting your time, you are representing that you have accurately reported your time and that you have not performed any work not reported. You may report any questions about time reporting, or any concerns you have about the accuracy of your wages, including any claim that you have not been paid for all hours worked, or that any deductions from your wages are improper or in error, to Human Resources, the Verizon Services Payroll Department or to the VZ Compliance Guideline.

### 3.4 Protecting Company Communication and Information Systems

Communication and information systems, including company computers and mobile devices, are provided to employees to conduct Verizon business and are valuable assets that must be protected by all employees. You must protect company information and data from accidental or unauthorized disclosure, misuse, improper alteration or destruction. Limited personal use of communications equipment is permissible so long as it does not interfere with work responsibilities or business operations, incur inappropriate costs, violate the law, this Code or Verizon policy.

You must protect the security of any identification access number, user ID or password that you use for any computer, network application or communication device. All electronic media—such as software, thumb drives, CD-ROMs and files—when acquired through public networks (e.g., the Internet) or from outside parties, must be checked for viruses prior to installation or use. Only approved and properly licensed software is to be used on company systems and its use is subject to the applicable software owner's license agreements. You must comply with applicable company policies when acquiring, accessing, using, altering, disposing of or destroying data, or when commenting on data over public networks (e.g., the Internet).

#### 3.4.1 Prohibited Activities

You may never use company systems (such as e-mail, instant messaging, the Intranet or Internet) to engage in activities that are unlawful, violate company policies or result in Verizon's liability or embarrassment. Some examples of inappropriate uses of the Internet and e-mail include:

- Pornographic, obscene, offensive, harassing or discriminatory content;
- Chain letters, pyramid schemes or unauthorized mass distributions;
- Communications on behalf of commercial ventures;
- Communications primarily directed to a group of employees inside the company on behalf of an outside organization;
- Gambling, auction-related materials or games;
- Large personal files containing graphic or audio material;
- Violation of others' intellectual property rights; and
- Malicious software or instructions for compromising the company's security.

Also, you may not send e-mail containing non-public company information to any personal e-mail or messaging service unless authorized to do so by your supervisor and you comply with company requirements relating to the encryption of information.

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**Q.** Can I check the weather on the internet with my computer?

**A.** Limited personal use of company systems is permissible if it conforms to Code standards.

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**Q.** A friend sent me a chain letter e-mail requesting that I forward to ten others to support a charitable cause. Is this O.K.?

**A.** No. Circulating chain letters through company systems or mail is prohibited.

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Always wear/display your identification badge at work.

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Always protect Verizon's property.

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Never compromise integrity for a quick solution.

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Intellectual property can be many things such as marketing strategies, business plans and other items. If you are not certain, contact the Legal Department.

### **3.5 Security of Facilities**

Verizon's operations must be appropriately secured to protect our customers and each other. This includes customer and employee personal information, network operations and facilities, computer systems and passwords, security procedures, company facilities and their locations, technical and marketing research data, product development information and business plans and strategies.

You must take all appropriate precautions to protect Verizon's systems and premises. Do not leave visitors unescorted or sensitive areas unattended or unlocked. When on company property (or, if appropriate, while on company business) wear your identification badge and request identification from others whom you do not recognize. Most importantly, you must immediately report all suspicious activity to Verizon Security.

### **3.6 Intellectual Property**

Intellectual property includes information protected by Verizon's trademarks or copyrights, the use of which is restricted by applicable intellectual property laws. To safeguard Verizon's intellectual property from illegal copying or other misuse, employees must ensure it is affixed with or identified by trademark, service mark or copyright symbols.

If you're unsure whether or what protection is necessary or appropriate, or if you believe disclosure or use by a third party is improper, contact the Legal Department.

#### **3.6.1 Proper Use of Others' Intellectual Property**

You must respect the proprietary rights of others by complying with all applicable laws and agreements that protect the intellectual property rights of others, including all business providers, competitors or customers. Unless you obtain the intellectual property owner's specific prior consent, you may not copy, distribute, display, perform, or modify third-party copyrighted materials or conduct peer-to-peer or other file sharing of copyrighted materials. A work may be protected by a copyright even if there is no notice on the work.

#### **3.6.2 Information of Former Employers**

Former employers may have required you to sign non-disclosure or other agreements that may affect your work at Verizon. If you have not disclosed these to your supervisor by the time of hire, you must do so immediately.

### 3.7 Handling External Communications

Unless you receive prior approval, you may never suggest that you are speaking on behalf of Verizon when presenting your personal views at community, professional or cultural functions or on the Internet.

Use of the company brand and logo by Verizon employees for commercial business purposes must adhere to approved corporate identity specifications. To seek guidance on appropriate use, visit the Brand Management intranet site [verizon.com/brandcentral](http://verizon.com/brandcentral). To report misuse, contact the Legal Department.

Verizon will generally deny requests for company-sponsored endorsements or testimonials. All requests, including the use of Verizon's name or an employee endorsement in any business provider's advertising or literature must be coordinated and approved by the Public Policy, Law and Security Department and the Corporate Brand Management organization.

Requests and inquiries must be referred to the authorized groups described below:

- **Media Relations** is responsible for contacts with the news media and inquiries about community relations.
- **Investor Relations** handles communications related to Verizon's financial performance and all contacts with the financial community.
- **Public Policy, Law and Security Department** handles contacts from outside attorneys, legislative bodies and regulatory agencies.
- **Human Resources** handles inquiries regarding current and former employees, including employment verification.
- **Public Policy, Law and Security Department** responds to subpoenas, court orders and criminal inquiries and interfaces with law enforcement on security matters, including emergency response.

**Q.** I am a Verizon employee and am designing new marketing materials that use the company logo. Is there any guidance that applies?

**A.** Yes, you must seek guidance about appropriate use from the Brand Management intranet site: [verizon.com/brandcentral](http://verizon.com/brandcentral).

**Q.** If I am using my personal social media account on my personal time, does the Code of Conduct really apply?

**A.** Yes, portions of the Verizon Code of Conduct still apply to your personal use of social media. For example, if you identify Verizon as your employer and post racist comments or comments encouraging acts of violence on your social media pages, such behavior may constitute prohibited off-duty misconduct.

For additional information about the proper use of social media, either in your individual capacity, or on behalf of Verizon, please review the company's social media policies: [vzweb2.verizon.com/social-media-compliance](http://vzweb2.verizon.com/social-media-compliance)

For approval to speak externally on behalf of Verizon, please contact Media Relations: [verizon.com/about/news/media-contacts](http://verizon.com/about/news/media-contacts)

For more information about speaking externally on behalf of Verizon, contact the Verizon Speaker Bureau: [vzweb2.verizon.com/verizon-speaker-bureau](http://vzweb2.verizon.com/verizon-speaker-bureau)

For legal assistance, please contact your business unit's assigned attorney. Please check within your department to identify your contact.

## Section

## 4

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Treat customers fairly in all aspects of transactions, including pricing, advertising, marketing and service solutions.

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Protect customer confidential information and respect customer privacy by following the Verizon Privacy Principles.

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## Maintaining Integrity and Fairness in the Marketplace

Verizon's integrity in the marketplace is a key component of our reputation for trustworthiness and service.

### 4.1 Customer Relationships

Verizon's customers expect and deserve fair, honest and respectful service. You are accountable for your role in the delivery of that standard of service.

#### 4.1.1 Customer Privacy and Communications

Verizon's privacy policies inform customers about what information is collected about them and how it is used. Customers are also given the ability to limit certain uses of their information. You must respect these choices. Verizon's privacy policies may be found at: [vzweb2.verizon.com/verizon-privacy-office](http://vzweb2.verizon.com/verizon-privacy-office). Verizon's Privacy Office can also assist with specific questions or concerns.

Except as otherwise required by the duties of your position, you must not—and must not permit others to—access, listen to, monitor, record, tamper with, disclose or intrude upon any customer conversation or communication, except to comply with a valid service or installation order, a valid legal order or applicable law, or for the limited purposes of quality monitoring and training, as approved by the Legal Department.

In addition to protecting customer communications, you must also protect customer information. That means you may not access, view, use, modify, share or distribute customer information without a proper business reason. You also may not access account information concerning yourself, your friends, acquaintances, family or coworkers without prior approval by your supervisor.

Verizon contractors and vendors must also protect customer information. You should work with the Legal Department to ensure that contracts with these third parties protect customer information. If you are aware of or suspect unauthorized access to, disclosure, or loss of customer information, you must immediately notify the Legal Department, Security or the VZ Compliance Guideline.

#### 4.1.2 Customer Marketing

Before using any customer information to market additional products or services, or disclosing customer information to other companies for marketing purposes, you must follow all company policies and applicable laws and regulations regarding the use and disclosure of this information.

When customers are also telecommunications carriers or resellers of telecommunications, you should not use their subscriber information, orders or processes/services to aid in Verizon's retail marketing or sales efforts.



### 4.1.3 Selling with Integrity

Verizon policy requires that we fully, clearly and directly inform our customers of the terms and conditions of our services. Any attempt to deceive a customer will not be tolerated and may result in disciplinary action up to and including termination of employment. The following guidelines must be followed at all times:

- All advertising and sales materials must be truthful and accurate. Materials must not be false, misleading or have a tendency to deceive. All claims must be substantiated in advance with a factual basis and back up. No advertising or sales materials will be released without Legal Department approval.
- When advertising the price of Verizon's products and services, the customer must be clearly informed of all monthly and per-use fees and any other material terms and restrictions for obtaining the advertised rate in marketing and promotional materials. There will be no "hidden" charges.
- Comparisons to competitors must be accurate and substantiated at the time they are made. Do not disparage competitors. You should promote Verizon's products and services through fair and accurate comparisons with its competitors, and sell on the strength of Verizon's products, services and reputation. Do not make misleading or inaccurate comparisons with competitors' products and services; comment on competitors' character, financial condition or potential legal or regulatory problems; or make negative remarks about entire groups of competitors and their products and services.
- There are strict rules regarding sales and promotions. They must be followed without exception. For example, you cannot use the word "free" without full disclosure of all material conditions disclosed in close proximity to the word.

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Provide accurate and clear information.

## 4.2 The Government as a Customer

When dealing with government agencies that are customers, you should consult with the Legal Department to identify additional laws, regulations and procedures that you must follow, including those related to gifts, entertainment, accuracy in billing and limitations on contacts with government officials during active government procurements.

### 4.2.1 Court Orders and Other Legal Documents

Verizon may receive court orders seeking information about its customers. You may neither confirm nor deny to any unauthorized person the existence of, or any information concerning, a subpoena, warrant or court order. You should immediately refer to Security any inquiries or requests of this kind.

If you receive any legal documents in the workplace, including court orders and subpoenas, warrants, summons and correspondence from any government or law enforcement agency, or any attorney, you must forward them immediately to the Legal Department.

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Learn and follow all additional requirements when dealing with the government as a customer.

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Ethical behavior is promoted by full and open disclosure.

**Q.** My wife manages a training consulting firm. Can she submit a proposal to become a Verizon vendor?

**A.** You should report this relationship to your supervisor, refer the matter to Corporate Sourcing and refrain from participating in Verizon's discussions or relationship on this matter.

**Q.** A vendor has offered me tickets to a baseball game. Can I accept them?

**A.** Possibly. If the vendor is inviting you to attend the game with him/her, this may constitute business entertainment and must comply with the Code's standards for business entertainment. If the vendor is not attending, then the tickets would be considered a gift and must comply with the Code's standards for accepting gifts.

## 4.2.2 Classified and National Security Information

You must take all necessary steps to protect classified and national security information and you must coordinate all activities related to this information with Security and Legal Department personnel who have appropriate clearance. It is never appropriate to disclose this information to another person without explicit approval from the Legal Department.

## 4.3 Selecting and Maintaining Relationships with Business Providers

You must use care and good judgment in selecting and maintaining relationships with all of Verizon's business providers. Employees who participate in the selection of any business provider must:

- Use a selection process that is fair, lawful, does not improperly discriminate and complies with all company policies and procedures;
- Ensure business providers are apprised of their obligation to abide by Verizon's standards of business conduct and the Verizon Supplier Code of Conduct;
- Put all agreements in writing and obtain all required approvals before signing; and
- Never reveal confidential information about one vendor to another vendor or to anyone outside of Verizon. Disclosures of such information, even within Verizon, should be limited to those with a need to know the information.

## 4.4 Gifts and Entertainment

The exchange of gifts and entertainment can promote successful working relationships and good will. However, failure to follow applicable laws as well as company rules and procedures can harm Verizon's reputation or result in civil or criminal penalties.

Regardless of value, the appearance of influence must always be considered before accepting any gift, entertainment or other business courtesy. You may not use your own money or resources to offer gifts or entertainment to a customer or vendor if these activities otherwise would be prohibited using Verizon's resources. In addition, when you offer gifts or provide entertainment to others consistent with this Code, you must also ensure that these courtesies are properly reflected on Verizon's books and records.

### 4.4.1 When Gifts are Appropriate

A "gift" is anything of value, including promotional trinkets, food, beverages and tickets to cultural or sporting events, that you or someone in your family or household—or a person with whom you have a close personal relationship—either give or receive.

To be appropriate, a gift (whether it is given or received) must be in compliance with applicable laws and:

- Unsolicited;
- Not cash or usable as cash (including gift cards and gift certificates, unless they have been approved as part of a Verizon marketing promotion or other authorized Verizon program and approved by the Legal Department); and
- No more than \$150 in face value in a calendar year to or from the same organization, unless approved by a director level or above supervisor and the Ethics Office.

## 4.4.2 When Entertainment is Appropriate

Entertainment includes meals and cultural or sporting events that you attend with a customer or business provider. If you do not attend the event with the customer or business provider, the tickets to such an event are not entertainment, but rather "gifts," which are subject to the gift restrictions in this Code.

To be appropriate, entertainment must be in compliance with applicable laws and:

- Offered or accepted in the normal course of business;
- Attended by both a Verizon employee and a business provider's employee and be an occasion where business is discussed;
- No more than \$250 in value per occasion, per person unless approved by a director level or above supervisor and the Ethics Office; and
- At a venue and conducted in a manner that does not violate other provisions of this Code or harm the company's reputation (e.g., an event at an adult entertainment venue is not acceptable).

## 4.4.3 Prohibited Exchanges

Even if the gift or entertainment meets the above standards, you must not exchange it if: (a) it is intended to improperly influence another person's business judgment; (b) it might create the appearance of undue influence, unfairness or impropriety; or (c) you are participating in, conducting or directly supervising a formal Verizon procurement process (such as a request for bids).

Employees are not permitted to receive tips and you should politely decline any that are offered to you.

## 4.4.4 Gifts Involving Travel or Lodging

You are prohibited from receiving gifts of travel or lodging unless you receive the prior approval of the Ethics Office.

## 4.4.5 Returning Gifts

If a gift exceeds the standards set forth in this Code, you should return the gift with an explanation that company standards do not permit you to accept such gifts. If returning a perishable item is not feasible, it should be anonymously donated to charity or accepted on behalf of Verizon and shared among all employees in the office. If shared, the gift's value per person should not exceed the \$150 calendar year limit.

If you receive a gift that falls outside of the Verizon standards and you are unable to return it, you must contact the VZ Compliance Guideline for appropriate documentation, safeguarding and disposition of the gift.

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You should never use gifts and entertainment to place undue influence on Verizon's business providers.

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**Q.** My sales team is working on Verizon's bid response to a non-government customer's Request for Proposal. I would like to take the customer to dinner to discuss our proposal. Can I pay for the customer's meal?

**A.** Yes, it is permissible to pay for the meal as long as it conforms with the Code's standards for business entertainment, applicable policies and legal standards. However, the exchange of gifts during a procurement process is improper because such gifts can create the appearance of undue influence.



**Q.** I sell Verizon products to state governments. Can I take my state government contact to a football game, using Verizon's tickets?

**A.** You must obtain written Legal approval before providing any gifts, entertainment, or anything else of value to a government official or employee.

You may not rehire or contract with a former employee unless that person has been separated from the company for a minimum time period of six months. Any exceptions must comply with this Code and applicable policy.

#### 4.4.6 Gifts Outside the Workplace

Employees who are personal friends of customers or business providers might wish to exchange gifts outside of the workplace for appropriate events (such as a wedding or baby shower). These exchanges should be infrequent, disconnected from any work activities and disclosed to a supervisor beforehand to ensure that they do not improperly influence or appear to influence business decisions.

#### 4.4.7 Gifts and Entertainment Involving Government Officials

Special rules apply to interactions with government officials and employees. Laws, rules and regulations concerning appropriate gifts and entertainment for government officials and employees are complex and can vary depending on government branch, state or other jurisdiction. Additionally, the Foreign Corrupt Practices Act (discussed further in section 4.9.4) restricts the exchange of gifts and entertainment with non-U.S. officials.

All employees must obtain advance written approval from the Legal Department before providing gifts, entertainment, or anything else of value to any government official or employee.

#### 4.5 Bribes, Kickbacks and Loans

It is never appropriate to offer, pay, or receive bribes or kickbacks (including to or from any government official or employee), which can subject you to civil or criminal penalties. You should immediately notify the Legal Department about any payment or gift that is offered to you, or requested from you, that you believe may be a bribe, kickback, solicitation of a bribe or kickback, or otherwise improper.

It is never appropriate to offer or accept personal loans or guarantees (e.g., preferences or discounts not offered widely) to or from customers, business providers or competitors of Verizon.

#### 4.6 Relationships with and Obligations of Departing and Former Employees

Your obligation to abide by company standards exists even after your employment with Verizon ends. The following requirements apply to all current, departing and former Verizon employees:

- When leaving or retiring, you must ensure that you return all Verizon property in your possession, including all records and equipment.
- You may not breach any employment condition or agreement you have with Verizon. You may not use or disclose Verizon non-public information in any subsequent employment, unless you receive written permission in advance from a Verizon vice president level or above supervisor and the Legal Department.
- You may not provide any Verizon non-public company information to former employees, unless authorized. If a former employee solicits non-public information from you, you must immediately notify Security or the Legal Department.
- Except as authorized below, you may not rehire a former employee, engage a former employee as an independent contractor or contingent worker, or purchase products or services on Verizon's behalf from a former employee unless that former employee has been separated from the company for at least six months.

- In extremely limited circumstances, the Executive Vice President - Human Resources may, in writing prior to the engagement, and upon finding a compelling reason, approve the rehire of a former employee or the engagement of a former employee as an independent contractor or contingent worker within six months of that person's separation.
- A vice president level or above supervisor may, in writing prior to the purchase, and upon finding a compelling reason, approve the purchase of products or services on Verizon's behalf from a former employee within six months of that person's separation. Where a former employee has been separated from Verizon for more than six months, authorization from your supervisor must be obtained before products or services are purchased from that former employee.

If you are concerned that a former Verizon employee is benefiting unfairly from information obtained while employed at Verizon, or may be inappropriately receiving Verizon non-public information, you should contact the VZ Compliance Guideline for guidance.

## 4.7 Interaction with Competitors

Verizon is dedicated to ethical, fair and vigorous competition. We will sell our products and services on the basis of their merit, superior quality and competitive pricing. Any questions concerning competition laws should be reviewed with the Legal Department.

We sell our products and services on the basis of their merit, superior quality and competitive pricing.

### 4.7.1 Avoiding Violations of the Antitrust and Competition Laws

The U.S. antitrust laws prohibit certain activities. If you have any questions about whether any activity falls into the following categories, or if you have any information about someone in the company engaging in the following types of conduct, you must contact the Legal Department.

You should also contact the Legal Department to determine the applicability of antitrust or competition laws of any other country in which you conduct business.

The antitrust laws prohibit agreements with competitors fixing prices, dividing markets, rigging bids or otherwise limiting competition. Explicit agreements, informal "gentlemen's agreements," and even a "wink and a nod" are against the law. Violation of these prohibitions may result in serious consequences for you or the company, including criminal penalties and imprisonment.

The following activities are prohibited:

- **Price Fixing:** You must not agree with a competitor on prices or set prices in concert with a competitor. This also prohibits discussions on things that influence price, such as costs, marketing and sales strategies, future product or geographic expansion plans, credit terms, and other competitively sensitive information.
- **Market Allocation:** You must not agree with a competitor to divide markets, products, customers, or segments. You must not engage in any communications with competitors about the places or customers for which they or Verizon are competing.
- **Bid Rigging:** You must not agree with a competitor to set the terms or direct the outcome of a bidding process. You also must not engage in any communications with competitors about bids.

**Q.** I have established good relations with the account executives of some of our competitors. At trade shows and conferences we often catch up on industry trends, customer deals, etc. Is this appropriate?

**A.** Use caution in these situations and do not discuss the price or terms of any Verizon contracts or gain competitive information directly from a competitor. You should not even joke about work-related topics since this could be misinterpreted. You should refuse to discuss any anti-competitive issues and leave such conversations immediately.

You must make independent pricing and marketing decisions and cannot coordinate your actions with Verizon's competitors.

Deal fairly and honestly in all activities, including pricing, licensing and rights to sell.

- **Group Boycotts:** You must not boycott a supplier or customer as a way to make the supplier or customer stop dealing with a rival. A group boycott—an agreement with others not to deal with another person or business—may violate the antitrust laws if it is used to force customers to pay higher prices or to hinder a rival from entering the market.

In addition, you should be careful of the following:

- **Joint Ventures, Teaming Arrangements and Non-Competition Agreements:** The antitrust laws do not prohibit all joint ventures or teaming arrangements. Sometimes, agreements not to compete are permissible as part of otherwise valid business arrangements. But those occasions are limited and must be approved by the Legal Department. You may not submit a joint bid, enter into a joint venture or teaming arrangement or negotiate a non-compete agreement without the approval and involvement of the Legal Department.

The antitrust laws also prohibit certain types of unilateral conduct, that is, conduct undertaken by Verizon alone. Violation of this prohibition may result in large fines and judgments against the company.

You must not engage in the following conduct:

- **Sabotage:** Do not tamper with competitors' products, sales materials or other property.
- **False Statements:** When making comparisons to a competitor, stick to the facts. Do not embellish, exaggerate or mislead.

The antitrust laws limit the circumstances in which certain business or marketing decisions are permissible. Before engaging in any of the conduct described below, consult the Legal Department for guidance:

- **Exclusive Dealing:** Exclusive dealing occurs when a company requires, as a condition of doing business, that a customer forego dealing with competitors.
- **Resale Prices:** Resale price setting occurs when a company establishes the price that resellers or distributors charge for Verizon's products.
- **Refusals To Deal:** Refusals to deal occur when a company declines to offer to one customer a service that it makes available to other customers, or when a company offers a service to one customer on more burdensome terms than it makes available to other similarly situated customers.
- **Tying:** Tying occurs when a company forces a customer who wants one product to buy a second product also, as a condition of buying the desired product.
- **Bundling:** Bundling occurs when a company offers a discount on one product if it is purchased together with another.
- **Below-cost Pricing:** Pricing below cost occurs when a company does not recover its costs for a particular product, or bundle of products.

## 4.7.2 Gathering Information About Competitors

While it is entirely proper for employees to gather information about competitors, you must avoid even the appearance of improperly acquiring this information. You must accurately represent yourself and never misrepresent your identity when gathering competitive information. You must also ensure that any agents or consultants employed to obtain competitive information on Verizon's behalf also represent themselves accurately and follow these principles.

Generally, it is appropriate to gather competitive information from public sources, industry gatherings and surveys and benchmarking/competitive research. It is never appropriate to request or obtain non-public competitor information from government or agency reports that are not available to the public from other competitors or former employees of competitors, who must abide by any non-disclosure or confidentiality agreements with their former employers, unless you are well briefed beforehand by the Legal Department regarding what you can and cannot discuss. It is also never appropriate to commit theft, espionage or breach of a competitor's non-disclosure agreement. To the extent that information is clearly private or marked in such a way as to indicate it is private, you should not use it and should contact the Legal Department for guidance.

If you have reason to believe that competitive information from customers or others may not be public, you should consult with the Legal Department before accepting or using this information.

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Accurately identify yourself when you gather public information about competitors.

## 4.8 Relationships With Affiliates

In order to ensure that the company's organizational structure is not used unfairly, all transactions between and among the Verizon companies (also called "affiliates") must comply with company policy and all applicable laws and regulations, including affiliate pricing and Customer Proprietary Network Information (CPNI) requirements.

## 4.9 International Relationships

Verizon must abide by the laws, rules and regulations of countries where we do business. If your job, or the jobs of anyone you supervise, involves business with customers or vendors in another country, you must be familiar with all laws that impact your work. Because cultural differences and local customs or laws may raise issues, prior to engaging in any international business, you should review this section and discuss these issues with your supervisor and your business unit Legal Department or Corporate Compliance Counsel.

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When working abroad, you must adhere to this Code of Conduct, as consistent with applicable laws.

### 4.9.1 Locating Offices or Receiving Services Outside of the United States

If you are considering locating or moving a project, unit, group or any Verizon activity outside the United States, or obtaining services from employees or external providers located outside the United States (including any call center or IT services from individuals located outside of the United States), you must contact the Legal Department to determine the rules, policies and laws that may apply.

#### 4.9.2 Compliance with Screening Requirements of the Office of Foreign Asset Control (OFAC)

The regulations promulgated by the Office of Foreign Asset Control (OFAC) of the U.S. Department of the Treasury prohibit any U.S. person, including employees of U.S. companies located outside the U.S., from transferring, paying, receiving or otherwise dealing in property or an interest in property belonging to or under the control of a large number of specially designated individuals and entities (the OFAC List). Violations of these regulations can result in substantial fines and imprisonment.

To comply with the OFAC regulations, those entities with which we transact directly must be screened against the OFAC List. In addition, we must not transact indirectly, through our contractors, tenants, landlords or vendors, with individuals and entities on the OFAC List. To this end, compliance with the OFAC regulations is also an integral obligation of our agents, vendors, suppliers and other third parties, as reflected in our Supplier Code of Conduct and our OFAC Export Control Guidance for Vendors & Suppliers.

You should contact your business unit Legal Department or Corporate Compliance Counsel to confirm compliance with OFAC screening requirements.

#### 4.9.3 Import/Export Control

It is Verizon's policy to comply with all import and export laws and regulations, including the U.S. Export Administration Act and the International Traffic in Arms Regulations (ITAR), as well as the import and export laws and regulations of all countries applicable to our global business. Failure to do so could result in civil and criminal penalties, imprisonment and the loss of Verizon's ability to import or export products and services and retain government contracting privileges.

Because specific authorizations or licensing may be required for particular transactions, you should contact your business unit Export Control Coordinator, your business unit Legal Department or Corporate Compliance Counsel before:

- Exporting via physical shipment, electronic means or any other means of transfer any product, service or technical information from the U.S. or moving it between or among countries. Technical information can consist of manufacturing processes, product use or commercial and technical expertise, data or software;
- Exporting products or services identified on the U.S. Munitions List contained in the ITAR;
- Taking any product, service or technical information with you when you travel to another country on personal or company sponsored business;
- Providing any product, service or technical information to parties that previously have been denied an export license; or
- Discussing with or displaying to non-U.S. nationals (including Verizon employees), whether inside or outside the U.S., any Verizon technical data, equipment or non-public information or its application, whether inside or outside the U.S., either on company or personal business.

You should consult your business unit Export Control Coordinator or Corporate Compliance Counsel to identify situations that may require written assurance by non-U.S. recipients that they will abide by U.S. export control regulations.

It is important to remember that export regulations likely exist and will need to be adhered to, regardless of the country from which an export originates. Most countries have implemented comprehensive export control regimes. Contact your Corporate Compliance Counsel or business unit Legal Department prior to shipping across borders.



#### 4.9.4 Payments, Lobbying, Expenses and Recordkeeping Requirements Globally

The payments we make, lobbying we conduct and expenses we incur in the course of doing business internationally must reflect the value of the services actually provided, be directed to proper business purposes, be made to legitimate business service providers, be accurately documented and meet the requirements of the laws of the U.S. and of other countries where we do business.

A growing number of countries have anti-corruption laws which make it a crime to bribe government officials and others with whom Verizon conducts business. One key law governing our conduct of business outside the U.S. is the Foreign Corrupt Practices Act (FCPA), which prohibits bribes and provision of other improper payments or items of value, or offers or agreements to pay bribes or provide other improper payments or items of value to a non-U.S. government official. Because Verizon is incorporated in the U.S., the FCPA applies to all Verizon employees around the world.

Another key anti-corruption law governing Verizon's global business activities is the U.K. Bribery Act, which prohibits bribery and other improper payments, as well as offering, requesting, or agreeing to bribes or other improper payments, to or from not only government officials but also non-governmental third parties. The U.K. Bribery Act may apply to anyone performing services for or on behalf of Verizon in any country.

Before offering meals, gifts, gratuities, entertainment or anything of value to any government official, you must consult with your business unit Legal Department or Corporate Compliance Counsel regarding compliance with applicable anti-corruption laws and Verizon standards. Also consult with your business unit Legal Department or Corporate Compliance Counsel regarding any payment or gift that is requested from you or offered to you that you believe may be a bribe, solicitation of a bribe or otherwise improper, even if it does not involve a government official.

Additionally, you must never make payments to a third party that you suspect may be passed to government officials or other persons to improperly influence any person's decision-making to secure, retain or direct business for Verizon. You must not use an agent to make any payment that Verizon itself cannot make. Whenever you retain any agent in connection with our global business, you must make sure that you can properly trace any funds provided to the agent to ensure that they are not used to make improper payments.

Regardless of the customs of a particular country, you must be careful to follow company standards, local laws and U.S. laws regarding doing business with government officials or their family members.

Verizon is required to accurately record information regarding payment, including the amount and recipient. These record-keeping requirements apply to any agents or consultants who represent Verizon. This means that you must ensure that Verizon—or any agent or consultant who acts on Verizon's behalf—properly documents all transactions and maintains accurate information with respect to the amount and ultimate recipient of contract payments, commissions and other payments.

You should consult with your business unit Legal Department or Corporate Compliance Counsel if you have any questions about anti-corruption laws, Verizon's anti-corruption compliance program, or your individual compliance obligations.

**Q.** In conjunction with a deal I am working on, a government official has asked Verizon to pay a "processing fee" to expedite clearing customs. What should I do?

**A.** "Expediting" or "facilitating" payments are unlawful in many circumstances and are generally prohibited at Verizon. You must immediately notify Corporate Compliance Counsel or your business unit Legal Department Vice President about any requests to pay what you believe may be an expediting or facilitating payment.

**Q.** My business group was recently contacted by a foreign organization that wants to arrange for the purchase of certain services and products from Verizon. The organization is headquartered in a country in which we have never done business. What should I do?

**A.** Before discussing business with this organization, you must first check with the Legal Department to determine if you will be doing business in a country or with an organization that is the subject of any legally imposed economic sanctions.

## 4.9.5 Economic Sanctions and Embargoes

It is illegal under U.S. law for any U.S. company or person (including employees of U.S. companies located outside the U.S.) to engage in transactions with a number of designated countries, or with certain designated parties anywhere in the world (for example, groups that support terrorism). You should check with the Legal Department regarding sanctions and embargoes by the U.S. and other countries that prohibit conducting business in specific countries or with specifically identified parties.

In addition, because the United States and other countries have restricted travel to certain countries, employees who travel internationally must familiarize themselves with any prohibitions on travel due to sanctions or embargoes, restrictions on taking company assets into certain countries and the rules and procedures for obtaining and using business travel documents, including passports, visas, approvals and special documentation.

## 4.9.6 Illegal Boycotts

Verizon will not participate in boycotts of countries, their nationals or blacklisted companies, unless these boycotts are sanctioned by the U.S. government and participation by Verizon is approved by your business unit Legal Department or Corporate Compliance Counsel. Nor will Verizon disclose information about present or prospective business relationships in countries that are the subject of illegal or improper boycotts.

Unless approved by your business unit Legal Department or Corporate Compliance Counsel, you must not furnish information about:

- Verizon's past, present or prospective business relationships with illegally boycotted countries or blacklisted companies; or
- Any person's: a) race, religion, gender, national origin or nationality, b) membership in or support of a charitable or fraternal organization supporting boycotted countries, c) relationship with nationals of boycotted countries, or d) relationship with a boycotted country or blacklisted company; or
- Any person believed to be restricted from doing business with a boycotted country.

Any request for information regarding boycotted countries or organizations must be immediately referred to Corporate Compliance Counsel.

## Conclusion

It is not possible to describe all unethical or illegal business practices in detail. The best guidelines are individual conscience, common sense and unwavering compliance with all company policies, applicable laws, regulations and contractual obligations. Seek guidance if you are unsure of what to do, ask questions and report wrongdoing. Company policy strictly forbids any retaliation against an employee who reports suspected wrongdoing.

Violations of the law, the Code and other company policies, procedures, instructions, practices and the like can lead to disciplinary action up to and including termination of employment. Such disciplinary action may also be taken against supervisors or executives who condone, permit or have knowledge of improper conduct or fail to take action to prevent and detect violations, such as failure to provide training and failure to supervise subordinates' work. No one may justify an illegal or improper act by claiming it was ordered by someone in higher management. The following are examples of actions considered illegal or unacceptable:

- Theft or unauthorized access, use or disclosure of company, customer or employee records, data, funds, property or information (whether or not it is proprietary);
- Working under the influence of alcohol or illegal substances or abusing legal substances;
- Improperly operating a vehicle for company business, or driving while on company business with a suspended or revoked license, or while under the influence of drugs or alcohol;
- Using any program or promotion in an unauthorized manner;
- Engaging in any form of workplace violence, including, but not limited to, any act of physical intimidation or assault, including threats of violence;
- Soliciting or giving the impression that you would expect gifts or gratuities from suppliers or customers;
- Disparaging or misrepresenting the company's products or services or its employees;
- Falsifying a company record, such as a time report; and
- Misrepresenting your health status or other reasons for absence, such as misrepresenting yourself as disabled and receiving disability benefits.

## Sources of Help

Verizon provides many resources to help you make ethical decisions. In addition to your supervisor, you may consult with Human Resources, the Legal Department or call the VZ Compliance Guideline.

Verizon's VZWeb (Intranet), [vzweb2.verizon.com](http://vzweb2.verizon.com), contains expansive helpful contact and subject matter information. In addition, please reference the chart below for some important resources.

## Quick Reference Chart

Resource	Phone Number	Website/Email
VZ Compliance Guideline	844.VZ GUIDE	<a href="http://verizonguideline.com">verizonguideline.com</a>
Office of Ethics and Business Conduct (Ethics Office)	844.894.8433 (U.S.) (+)800.0.624.0007 (International)	<a href="mailto:vzguide@verizon.com">vzguide@verizon.com</a> <a href="http://aboutyou.verizon.com/HRGuidelines/VzCulture/EthicsCompliance">aboutyou.verizon.com/HRGuidelines/VzCulture/EthicsCompliance</a>
Human Resources (U.S.)	Consult website	<a href="http://aboutyou.verizon.com/HRGuidelines">aboutyou.verizon.com/HRGuidelines</a>
Human Resources (International)	(+)800.0.932.7947 Vnet 932.7947	<a href="http://aboutyou.verizon.com/HRGuidelines">aboutyou.verizon.com/HRGuidelines</a>
Security (U.S.)	800.997.3287	<a href="http://security.verizon.com">security.verizon.com</a>
Security (International)	972.615.4343	<a href="http://security.verizon.com">security.verizon.com</a> , Click "International Security"
Corporate Compliance	Consult website	<a href="http://vzweb2.verizon.com/verizon-compliance">vzweb2.verizon.com/verizon-compliance</a>
Internal Audit	844.VZ GUIDE 844.894.8433 (U.S.) (+)800.0.624.0007 (International)	<a href="http://vzweb2.verizon.com/verizon-internal-audit">vzweb2.verizon.com/verizon-internal-audit</a>
Privacy Office	Consult website	<a href="http://vzweb2.verizon.com/verizon-privacy-office">vzweb2.verizon.com/verizon-privacy-office</a>
Environmental, Health & Safety	800.386.9639 (U.S.) (+)800.386.9639 (International)	<a href="http://aboutyou.verizon.com/HRGuidelines/VzCulture/SafetyAndEnvironmentalCompliance">aboutyou.verizon.com/HRGuidelines/VzCulture/SafetyAndEnvironmentalCompliance</a> <a href="https://vzweb2.verizon.com/compliance-environment-health-safety-and-vehicles">https://vzweb2.verizon.com/compliance-environment-health-safety-and-vehicles</a> (Wireless Network Environmental)
Export Control Compliance	Consult website	<a href="http://vzweb2.verizon.com/export-controls-embargoes-and-sanctions-and-anti-boycott-compliance">vzweb2.verizon.com/export-controls-embargoes-and-sanctions-and-anti-boycott-compliance</a>

Resource	Phone Number	Website
Public Policy, Law & Security	Consult website	<a href="http://vzweb2.verizon.com/public-policy-law-and-security-0">vzweb2.verizon.com/public-policy-law-and-security-0</a>
Subpoenas & Court Orders	800.451.5242	<a href="http://security.verizon.com/Securitywebsite/SecurityOrganizations/LegalCompliance/LCContacts/tabid/455/Default.aspx">security.verizon.com/Securitywebsite/SecurityOrganizations/LegalCompliance/LCContacts/tabid/455/Default.aspx</a>
Media Relations	Consult website	<a href="http://verizon.com/about/news/media-contacts">verizon.com/about/news/media-contacts</a>
Investor Relations	Consult website	<a href="http://verizon.com/about/investors/contact-investor-relations">verizon.com/about/investors/contact-investor-relations</a>
Corporate Responsibility (including Verizon Foundation)	Consult website	<a href="http://responsibility.verizon.com">responsibility.verizon.com</a>
Employee Assistance Program (U.S.)	888.441.8674	<a href="http://anthem.com/eap/verizon">anthem.com/eap/verizon</a>
Employee Assistance Program (International)	Consult website	<a href="http://anthem.com/eap/global">anthem.com/eap/global</a>

## Notes



# RadioFreeEurope RadioLiberty



## RFE/RL Code of Professional Journalism

(Section 2.2 of RFE/RL Policies and Procedures)

All RFE/RL journalists, journalistic contributors and regional analysts must observe the following principles:

### Accuracy

- » RFE/RL journalists and regional analysts will do their utmost to ensure that all broadcasts and publications (including those transmitted via the Internet) are factually accurate. Where doubt or controversy may exist on significant points of fact, information must be based on at least two independent sources.
- » RFE/RL journalists and regional analysts will not broadcast or publish material that is based on rumor or unsubstantiated information.
- » Factual errors will be corrected as soon as possible.

### Impartiality

- » Information will be presented in a factual context that enhances understanding of the events and issues and provides clarity without distortion or bias.
- » Journalists and analysts will present opposing or differing views accurately and in a balanced manner on all issues, providing perspective to audiences and not merely platforms or positions. When groups or individuals whose views are important for balanced programming decline to comment, it is appropriate to note this in the story or article.
- » RFE/RL shall be independent from any political party, ruling or opposition group, emigre organization, commercial or other special-interest organization, or religious body, whether inside or outside the set of countries to which RFE/RL broadcasts radio or television programming (the "Broadcast Area"); and shall not endorse or advocate any specific political, economic, or religious viewpoint.

### Analysis, Commentary and Editorials

- » Commentary is an integral part of modern journalism, alongside analysis and—most important of all—factual news reporting. Editorial management must ensure that RFE/RL audiences are presented with a diversity of views on controversial subjects. There must be a clear disclaimer that opinions expressed are those of the writer and do not represent RFE/RL's position. And commentaries from all sources must meet RFE/RL's professional standards.
- » Journalists must not insert their personal opinions or judgments in factual reports. Broadcasts and publications should generally contain background information and explanations that help the audience better understand the information reported.

[www.rferl.org](http://www.rferl.org)

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- » Commentary by RFE/RL journalists in RFE/RL programming, including the English-language website, requires the prior approval of the Executive Editor, an Associate Director of Broadcasting, or the Director of Central News.
- » Bureau staff or stringers may provide commentaries only in very exceptional cases and only if approved in advance by the Executive Editor or an Associate Director of Broadcasting.
- » Commentaries provided to RFE/RL by outside experts are welcomed. Writers and, where relevant, their affiliations must be clearly identified.
- » RFE/RL staff may contribute commentaries to other media outlets as long as the material neither embarrasses the Company nor violates the Conflict of Interest policy (Section 3.5.2). To coordinate the publication of outside contributions, RFE/RL staff is required to inform the Director of Communications in advance about the contribution (see Section 3.5.1- Media Contacts).
- » Freelancers who contribute to other media outlets can use their RFE/RL affiliation in their writing only with the prior approval of their RFE/RL editors.
- » RFE/RL journalists may publish private blogs but first must notify their supervisors. All RFE/RL personnel, including non-journalists, are expected to avoid embarrassing the Company when blogging or engaged in other on-line activities.

### **Tone of Moderation and Respect**

- » Broadcasts and publications shall at all times maintain a calm and moderate tone and project a model of civilized, reasoned discourse and a respect for the human rights of all persons. Broadcasts and publications shall not contain religious, ethnic, socio-economic, or cultural slurs upon any person or groups and shall observe common standards of etiquette and taste.
- » Broadcasts and publications shall not contain material that could be construed as inflammatory or as incitement to violence. Programming on disturbances or other tense situations must be balanced and factual.

### **Avoidance of Advocacy**

- » RFE/RL supports democracy and the human rights common to democratic states. However, RFE/RL shall not advocate the adoption of specific policies or legislation, nor shall programming endorse or oppose candidates for elective or appointed office.
- » RFE/RL supports the right of all peoples to self-determination as stated in the Helsinki Final Act of the Conference on Security and Cooperation in Europe. However, broadcasts and publications shall not advocate or endorse separatist or secessionist causes.
- » RFE/RL supports freedom of travel and migration for all peoples in accordance with internationally recognized norms. However, RFE/RL broadcasts and publications shall not incite the act of defection or encourage emigration.

### **Ethical Conduct**

- » RFE/RL staff and contributors to programs and publications shall maintain the highest ethical standards in all conduct, taking particular care to avoid any conflict of interest, or the appearance thereof, in their relations with individuals, groups, political or commercial interests inside or outside the Broadcast Area. RFE/RL staff and contributors shall in no way abuse their status as public figures or the good reputation of RFE/RL to promote personal interest or gain. See policy on Conflict of Interest (RFE/RL Policies & Procedures, Section 3.5.2).